

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JULIA ROSSI, DELILAH PARKER and  
KELVIN HOLMES, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiffs,

V.

CLAIRE'S STORES, INC.; CLAIRE'S  
BOUTIQUES, INC.; and CBI  
DISTRIBUTING CORP.,

Defendants.

Case No.: 1:20-cv-5090

Hon. Andrea R. Wood, presiding

Hon. Magistrate Heather K. McShain

**PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS  
ACTION SETTLEMENT AND CERTIFICATION OF SETTLEMENT CLASS**

Plaintiffs Julia Rossi, Delilah Parker, and Kevin Holmes (collectively, “Plaintiffs”), individually and on behalf of all others similarly situated, by and through their undersigned counsel, hereby move without opposition for preliminary approval of the class action settlement as well as certification of the proposed settlement class. In support of the instant motion, Plaintiffs incorporate the concurrently filed memorandum of law, the Joint Declaration of Bradley K. King and M. Anderson Berry, the Declaration of Robert Siciliano, and the proposed settlement agreement and accompanying exhibits.

Respectfully submitted,

Dated: June 16, 2021

/s/ Bradley K. King

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*Counsel for Plaintiffs and the Proposed Class*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 16, 2021, the foregoing Unopposed Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class, with supporting documents, was electronically filed with the Clerk of the United States District Court for the Northern District of Illinois, using the CM/ECF system, which will send notification of the filing to all attorneys of record.

*/s/ Bradley K. King*

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